ENERGY STAR Water Cooler Program
Industry Comments on
Version 1.0 Draft Specification
April 19, 2000

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The following is a summary of industry comments received to date regarding EPA's Version 1.0 draft bottled water cooler specification. Four interested parties (three manufacturers) submitted information and/or suggestions. All feedback was considered as EPA prepared Version 2.0 of the draft specification.

General

- One manufacturer commented that their engineering department tested their products (standby energy consumption), but the manufacturer did not follow-up with comments on the feasibility of the Version 1.0 specification.

- One manufacturer commented that their engineering department had some concerns about the requirements of Version 1.0, but had not tested their products to develop a more formal response.

- One manufacturer commented that they would need to discuss the issue of timers with their marketing department in more detail.

- One party commented that the testing procedure should be revised to also include operating energy. As standby losses become lower, operating energy will become increasingly important.

Definitions

- One manufacturer commented that the product is a bottled water cooler as opposed to a bottled water dispenser, which does not necessarily heat and/or cool the water.

- One manufacturer commented that the standby energy consumption definition should be re-worded to be clearer.

- One manufacturer commented that the product category including cold only and cook and cold units should specifically call out cook and cold units in the heading.

Testing Procedure

- One manufacturer commented that standard testing conditions are at 90^{o} F, and that if they do not test at 90^{o} F, it is standard for them to test at 15^{o} F increments off the standard.

- One manufacturer commented that 50^{o} F cold water dispensing temperature is standard.

- One manufacturer questioned why tests were conducted at temperatures specified in Version 1.0.

- One manufacturer commented that it is necessary to specify in the test procedure how to test that the water temperature specifications were within the test range when drawing water from the unit is not permitted.

Specification

- One manufacturer commented that our baseline standby consumption for cold only units is too low. Industry measured unit standby consumption on the order of 0.6-0.7 kWh/day as opposed to our estimate of 0.18 kWh/day, making our specification have a reduction requirement of over 70%.